

**IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

DISTRICT OF COLUMBIA
441 4th Street NW
Washington, D.C. 20001

Plaintiff

v.

EVERETT MURTAGH
1124 G Street NE
Washington, D.C. 20002;

and

OXANA JOURKIV
1124 G Street NE
Washington, D.C. 20002

Defendants.

Civ. No. 2018-CA-_____

COMPLAINT

The District of Columbia (the “District”), by and through the Office of the Attorney General for the District of Columbia, files this complaint against Defendants Everett Murtagh and Oxana Jourkiv (“Defendants”) for violations of the Drug-, Firearm-, or Prostitution-Related Nuisance Abatement Act, D.C. Code §§ 42-3101 to -3114 (“Nuisance Act”). Defendants own a four-unit apartment building located at 1610 R Street SE, Washington, DC 20020 (the “Property” or “1610 R Street SE”). The District seeks an order pursuant to the Nuisance Act requiring Defendant to abate the public nuisance and awarding attorney fees, civil penalties, and injunctive relief. In support, the District states as follows:

PRELIMINARY STATEMENT

1. The District brings this action to address the Defendants' continued failure to abate the drug- and firearm-related activity at the Property, specifically in Apartment 2. A drug- or firearm-related nuisance exists where any real property, in whole or in part, is used or intended to be used to either: (a) facilitate any violation of Title 48, Chapter 9 of the District of Columbia Municipal Regulations, D.C. Code § 42-3101(5)(A); or (b) unlawfully store or otherwise keep one or more firearms, or manufacture or sell controlled substances or drug paraphernalia, that has an adverse impact on the community, D.C. Code § 42-3101(5)(B).

2. Here, a drug- and firearm-related nuisance exists under both D.C. Code § 42-3101(5)(A) and (B). The Property has been the site of ongoing drug- and firearm-related activities over the past year, including multiple arrests incident to investigative purchases of controlled substances. Since July 1, 2017, this four-unit Property has generated 27 calls for service to the Metropolitan Police Department ("MPD"). The tenants of the Property who are not involved in these nuisance activities are severely impacted by the continual risk to their safety.

3. Moreover, the Property is within a "Drug Free Zone" as defined under D.C. Code § 48-904.07a. The Property is within 400 feet of Anacostia High School and within 800 feet of Kramer Middle School. The proximity of this persistent drug activity to multiple D.C. public schools amplifies the adverse community impact.

4. The District brings this action pursuant to the Nuisance Act seeking "an order permanently enjoining, abating, and preventing the continuance or recurrence of the nuisance." D.C. Code § 42-3110. Specifically, the District seeks to compel Defendants to eliminate the persistent criminal activity at the Property, evict the tenant in Apartment 2, install security

cameras to curb recurring drug activity, enforce barring notices, and pay damages for each day since Defendants were first put on notice of the Nuisance Act violations.

Jurisdiction

5. The Court has subject matter jurisdiction pursuant to D.C. Code § 11-921 and § 42-3102.

6. The Court has personal jurisdiction pursuant to D.C. Code § 13-423.

Parties

7. Plaintiff the District of Columbia (“District”) is a municipal corporation empowered to sue and be sued, and is the local government for the territory constituting the permanent seat of the federal government. The District is represented in this case by and through its chief legal officer, the Attorney General for the District of Columbia. The Attorney General has general charge and conduct of all legal business of the District and all suits initiated by and against the District and is responsible for upholding the public interest. The Attorney General is also specifically authorized to enforce the Nuisance Act.

8. Defendants Everett Murtagh and Oxana Jourkiv reside in the District at 1124 G Street NE, Washington, D.C. 20002. Defendants Everett Murtagh and Oxana Jourkiv have held legal title to 1610 R Street SE since October 17, 2016. (*See* Ex. 1, Deed).

Facts

A. Search Warrants and Arrests

9. Since March 2018, MPD has made eighteen arrests at the Property for a number of drug-related offenses including possession of a controlled substance, possession of drug paraphernalia, distribution of a controlled substance, and possession with intent to distribute.

10. On March 4, 2018, MPD officers arrested three subjects at the property for involvement in an illegal drug transaction. Officers seized plastic bags containing a loose rock-like substance, \$568 in U.S. currency, \$20 in pre-recorded MPD funds, and a digital scale. (*See* Ex. 2, March 4, 2018 Incident Report).

11. On March 11, 2018, MPD officers arrested two subjects at the Property for distribution of crack cocaine. Officers seized loose white rock and \$100 in U.S. currency. (*See* Ex. 3, March 11, 2018 Incident Report).

12. On April 8, 2018, MPD officers arrested one subject at the Property for distributing narcotics. Officers seized loose white rock and a green zip bags containing a powder substance. (*See* Ex. 4, April 8, 2018 Incident Report).

13. On April 15, 2018, MPD officers arrested two subjects at the Property for possession of a controlled substance and recovered a loose white rock substance. Later that day, in connection with an undercover drug enforcement operation, officers arrested another subject at the Property for distribution and possession of crack cocaine. (*See* Ex. 5, First April 15, 2018 Incident Report *and* Ex. 6, Second April 15, 2018 Incident Report).

14. On April 18, 2018, MPD officers executed a search warrant at the Property and recovered cocaine, drug paraphernalia, and over \$5,500 in U.S. currency. Officers arrested five subjects at the Property. (*See* Ex. 7, April 18, 2018 Incident Report).

15. On July 4, 2018, MPD officers arrested a subject at the Property for possession of drug paraphernalia. The subject was found with a glass crack pipe, as well as a vial emitting a strong chemical odor consistent with PCP. (*See* Ex. 8, July 4, 2018 Incident Report).

16. On July 11, 2018, MPD officers executed another search warrant at the Property. Officers recovered cocaine, methamphetamines, drug paraphernalia, a firearm, and ammunition.

Officers arrested two subjects for possession of a crack cocaine and possession of an unregistered firearm. One of the individuals arrested was the tenant of Apartment 2, Phillip Mayrant. (*See Ex. 9, July 11, 2018 Incident Report*).

17. On July 25, 2018, one subject was observed by MPD officers completing a narcotics transaction during a buy/bust operation. The subject was placed under arrest for distribution of crack cocaine. (*See Ex. 10, July 25, 2018 Incident Report*).

B. Calls for Service

18. Over the past year, MPD has responded to at least twenty-seven calls for service at 1610 R Street SE, including calls for assault, carjacking, and drug complaints. Notably, at least four calls since March 1, 2018 were related to controlled substances. (*See Ex. 11, Calls for Service*).

C. Notice

19. On March 22, 2018, OAG sent the Defendants a notice letter advising of the presence of drug-related activity at 1610 R Street SE. That letter stated OAG may take action against a property owner for maintaining their property in a manner that causes, creates, or maintains a nuisance as defined under the Nuisance Act and gave the Defendant fourteen days to contact OAG. (*See Ex. 12, March 22, 2018 Notice Letter*).

20. In response to the March 22 letter, Defendant Everett Murtagh contacted OAG to discuss installation of security cameras and registration of those cameras with MPD's Private Security Camera System Incentive Program, as well as the likely eviction of the tenant in apartment 2.

21. In response to the search warrant executed on July 11, 2018, OAG sent another letter to Defendants on July 13, 2018. OAG advised Defendants of continued illegal activity at

the property, reiterated its recommendations for abatement, and additionally requested that two individuals be barred from the Property. OAG informed Defendants of the drug and firearm seizures resulting from the search warrant and attached the public incident report. (*See* Ex. 13, July 13, 2018 Notice Letter).

22. As of the filing date for this complaint, Defendants have neither evicted the tenant in Apartment 2 nor installed security cameras at the Property.

D. Reputation and Adverse Impact on Community

23. There has been an increased fear of residents to walk through or in public areas, such as sidewalks, streets, parks, and alleyways, near the Property due to the presence and use of firearms and the use and sale of controlled substances and paraphernalia at the Property. *See, e.g.,* Ex. 14, Aff. of Officer Michael Nardi at ¶ 10 (“MPD frequently receives citizen complaints related to these Properties. They are chronically on the drug complaint list.”).

24. Residents are sometimes solicited or approached by persons wishing to sell controlled substances near the Property. *See, e.g.,* Ex. 14 at ¶ 9 (“I believe that residents near the Propert[y] are routinely subject to unwanted solicitations to purchase drugs.”).

25. Officers frequently observe an increased volume of vehicular and pedestrian traffic to and from the Property related to the presence and use of firearms, drugs, and drug paraphernalia. *See, e.g.,* Ex. 14, at ¶ 8 (“I have observed an overwhelming volume of vehicular and pedestrian traffic to the Propert[y] that is related to drug purchases.”).

26. Investigative purchases of controlled substances by undercover law enforcement officers at and near the Property have led to the execution of many search warrants of 1610 R St. SE, Apartment 2 that resulted in multiple arrests and seizures of drugs, drug paraphernalia, firearms, and ammunition. *See, e.g.,* Ex. 14 at ¶ 11 (“MPD conducts investigative operations at

the Propert[y] approximately every month. That frequency has fallen because the Propert[y] lie[s] outside of MPD’s summer crime initiative area. Previously, MPD visited the Propert[y] at least once a week.”).

COUNT I
**(Abatement of a Drug- and Firearm- Related Nuisance Pursuant to
D.C. Code §§ 42-3101 to -3114)**

27. The District hereby incorporates by reference herein Paragraphs 1 through 26.

28. 1610 R Street SE, owned by the Defendants, is a drug- and firearm-related nuisance, as defined in D.C. Code § 42-3101(5), in that it is real property, used, or intended to be used to: “(A) facilitate any violation of Chapter 9 of Title 48 [and] (B) unlawfully store or otherwise keep one or more firearms, or that is used or intended to be used for the sale or manufacture of controlled substances or drug paraphernalia.”

29. 1610 R Street SE, owned by the Defendants, has an adverse impact on the community, as defined by D.C. Code § 42-3101(1). The adverse impact on the community caused by the drug- and firearm-related nuisance at the Property is extensive and continuous, amplified by the close proximity to D.C. schools.

30. Individuals in and around 1610 R Street SE are a consistent and serious threat to District residents, particularly those residing in other units at the Property.

31. Not only have Defendants failed to abate the nuisance, but they have caused it by their inaction despite notice from the District.

Relief Requested

Wherefore, the District of Columbia respectfully requests declaratory and injunctive relief and damages against the Defendants, as follows:

a) That the Court declares the rental housing accommodations located at 1610 R Street SE, owned by Defendants, to be a drug- and firearm-related nuisance pursuant to the Drug-, Firearm-, or Prostitution-Related Nuisance Abatement Act, D.C. Code §§ 42-3101 to -3114;

b) That the Court enjoins Defendants from creating and/or maintaining, or assisting in the creation or maintenance of a drug- or firearm-related nuisance property;

c) That the Court orders Defendants to institute an action for possession in the Landlord and Tenant Branch of the District of Columbia Superior Court against the occupant(s) of Apartment 2 under D.C. Code § 42-3602 (“Drug Haven statute”);

d) That the Court orders Defendants to install and maintain an appropriate security camera system, in consultation with MPD, to capture activity at and around the Property;

e) That the Court orders Defendants to enforce barring notices;

f) That the Defendant shall a) submit to the District copies of all served barring notices currently in the possession of Defendant, and prospectively, all served barring notices within one (1) week of issuance; and b) provide a copy of each such notice to the District by delivering a copy to Althea Geletka, Paralegal Specialist, Office of the Attorney General, 441 4th Street, NW, Suite 1060 North, Washington, D.C. 20001;

g) That the Court awards damages to be paid by the Defendants in the amount of \$150 per day since the date Defendant was first provided notice of the nuisance on March 22, 2018, to be paid into the Drug-, Firearm-, or Prostitution-Related Nuisance Abatement Fund pursuant to D.C. Code § 42-3111.01(a);

h) That the Court awards attorney fees; and

i) Any other relief that the Court deems appropriate.

Date: August 1, 2018

Respectfully Submitted,

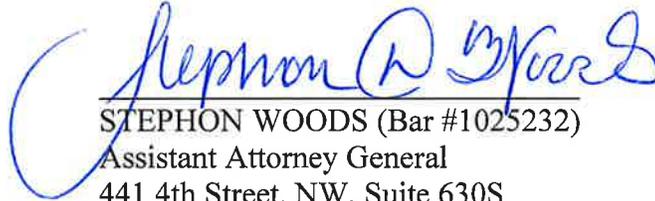
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Public Advocacy Division



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(202) 715-7728 (fax)
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Attorneys for the District of Columbia

EXHIBIT 1

File No. **EM-16-5496-FS**
DEED-SHORT FORM D.C.



This Deed, made this **17th** day of **October, 2016**, by and between Lissa Marie Bennett, formerly known of record as Lissa M. Evans, party of the first part, and Everett Murtagh and Oxana Jourkiv, Husband and Wife, parties of the second part.

WITNESSETH, that in consideration of the sum of Four Hundred Fifty Thousand and 00/100 Dollars (**\$450,000.00**), the party of the first part does hereby grant unto the parties of the second part, in fee simple, as tenants by the entirety, their assigns and unto the survivor of them, and the survivor's personal representatives and assigns, all that piece or parcel of land, together with the improvements, rights, privileges and appurtenances to the same belonging, situate in the District of Columbia, described as follows, to wit:

LOT NUMBERED ELEVEN (11) IN SQUARE NUMBERED FIFTY-FIVE HUNDRED NINETY-SEVEN (5597) IN THE SUBDIVISION MADE BY ALEXANDER L. GARDEN AND ANNIE GARDEN, AS PER PLAT RECORDED IN THE OFFICE OF THE SURVEYOR FOR THE DISTRICT OF COLUMBIA IN LIBER 103 AT FOLIO 190.

AND the said party of the first part covenants that she will warrant specially the property hereby conveyed; and that she will execute such further assurances of said land as may be requisite.

WITNESS the hand and seal the day and year first hereinbefore written.

IN PRESENCE OF:

Lissa Marie Bennett (SEAL)
Lissa Marie Bennett

DISTRICT OF COLUMBIA

I, *Shaun Marble*, a Notary Public, in and for the jurisdiction aforesaid, do hereby certify that Lissa Marie Bennett, who is personally well known to me as the grantor in, and the person who executed the foregoing and annexed deed, bearing the date of **October 17, 2016**, personally appeared before me in the said District and acknowledged the said deed to be her act and deed.

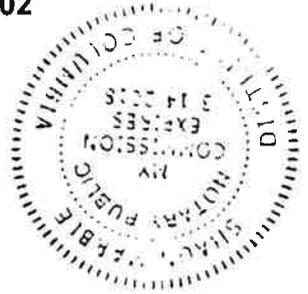
Given under my hand and seal this **17th** day of **October, 2016**.

Shaun Marble
Notary Public

My Commission Expires: *03 14 2018*

AFTER RECORDING MAIL TO:
1124 G Street, NE
Washington, DC 20002

GRANTEES ADDRESS:
1124 G Street, NE
Washington, DC 20002



Doc #: 2016112286 Fees: \$13,081.50
10/31/2016 02:43 PM Pages: 2
Filed and Recorded in Official Records of
WASH DC RECORDER OF DEEDS IDA WILLIAMS

RECORDING FEES	\$25.00
SURCHARGE	\$6.50
RECORDATION TAX FEES	\$6,525.00
TRANSFER TAX FEES	\$6,525.00



Property Detail

Address: 1610 R ST SE

SSL: 5597 0011

Record Details

Neighborhood:	ANACOSTIA	Sub-Neighborhood:	B
Use Code:	23 - Residential Flats-Less than 5	Class 3 Exception:	No
Tax Type:	TX - Taxable	Tax Class:	001 - Residential
Homestead Status:	** Not receiving the Homestead Deduction		
Assessor:	MARTELL JOHNSON		
Gross Building Area:		Ward:	8
Land Area:	3,849	Triennial Group:	1

Owner and Sales Information

Owner Name:	EVERETT MURTAGH
Mailing Address:	1124 G ST NE; WASHINGTON DC20002-4416
Sale Price:	\$450,000
Recordation Date:	10/31/2016
Instrument No.:	112286
Sales Code:	MARKET
Sales Type:	I - IMPROVED

Tax Year 2019 Preliminary Assessment Roll

	Current Value (2018)	Proposed New Value (2019)
Land:	\$140,300	\$140,760
Improvements:	\$310,820	\$351,380
Total Value:	\$451,120	\$492,140
Taxable Assessment: *	\$451,120	\$492,140

* Taxable Assessment after Tax Assessment Credit and after \$73,350 Homestead Credit, if applicable. (Click here for more information).

** If you believe you should be receiving tax relief through the Homestead deduction program and if you are domiciled in the District and this property is your principal place of residence, you can access the link below, complete the form, and return it per the instructions. For additional information regarding the Homestead program, call (202)727-4TAX. Click here to download the Homestead Deduction and Senior Citizen Tax Relief application *

Pay Here

[View Tax Information](#) | [View Property Features](#) | [View Payments](#) | [View Current Tax Bill](#)

EXHIBIT 2

CCN #18035810 – PUBLIC INCIDENT REPORT

REPORT DATE / TIME Mar 04, 2018 13:25	DISTRICT / PSA Sixth District / 607	EVENT START DATE / TIME - EVENT END DATE / TIME Mar 04, 2018 11:50 - Mar 04, 2018 12:15	INCIDENT STATISTICS	
RESPONDING OFFICER Travis Collins (#9686) – MPD		WEATHER Clear		
ASSISTING OFFICER (ASSIST TYPE)				
TELETYPE DATE / TIME	TELETYPE #	WHO NOTIFIED TELETYPE	SHOTS FIRED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	SHOTS EFFECT <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

REPORTING PERSON

NAME
R-2 Officer Collins (4536)

HOME ADDRESS
Unknown / No-Fixed

OFFENSE #1 – 18035810

OFFENSE Distribution Of A Controlled Substance (48DC904.01(A)(1)-Z, 48DC904.01A1-Y)	OFFENSE COMPLETION <input checked="" type="checkbox"/> COMPLETED <input type="checkbox"/> ATTEMPTED
OFFENSE CASE STATUS Cleared By Arrest (Mar 04, 2018)	
OFFENSE LOCATION 1610 R STREET SE, WASHINGTON, DC 20020 Type: Highway/ Road/ Alley/ Street/ Sidewalk Public/Private: Private PSA: 607 District: Sixth District	
LOCATION TYPE Highway/ Road/ Alley/ Street/ Sidewalk	POSITION (BEHIND, FRONT, INSIDE, SIDE)
LOCATION DESCRIPTION	
AGGRAVATED ASSAULT FACTORS/HOMICIDE FACTORS	OFFENSE PROPERTIES
HATE BIAS/MOTIVATION	
WEAPON/FORCE INVOLVED	
CRIMINAL ACTIVITIES Possession/ Conceal, Distribute/ Selling, Buying/ Receiving	MODUS OPERANDI
FORCED ENTRY <input type="checkbox"/> YES <input type="checkbox"/> NO	# OF PREMISES
SECURITY SYSTEM	CARGO THEFT <input type="checkbox"/> YES <input type="checkbox"/> NO
NEGLIGENT MANSLAUGHTER CIRCUMSTANCE	BUILDING INHABITED (ARSON)

OFFENSE #2 – 18035810

OFFENSE Poss Of A Controlled Substance -misd (48DC904.01D)	OFFENSE COMPLETION <input checked="" type="checkbox"/> COMPLETED <input type="checkbox"/> ATTEMPTED
OFFENSE CASE STATUS Cleared By Arrest (Mar 04, 2018)	
OFFENSE LOCATION 1610 R STREET SE, WASHINGTON, DC 20020 Unit: 2 Type: Highway/ Road/ Alley/ Street/ Sidewalk Public/Private: Private PSA: 607 District: Sixth District	
LOCATION TYPE Highway/ Road/ Alley/ Street/ Sidewalk	POSITION (BEHIND, FRONT, INSIDE, SIDE)
LOCATION DESCRIPTION	
AGGRAVATED ASSAULT FACTORS/HOMICIDE FACTORS	OFFENSE PROPERTIES
HATE BIAS/MOTIVATION	

WEAPON/FORCE INVOLVED			
CRIMINAL ACTIVITIES		MODUS OPERANDI	
Possession/ Conceal			
FORCED ENTRY	# OF PREMISES	SECURITY SYSTEM	CARGO THEFT
<input type="checkbox"/> YES <input type="checkbox"/> NO			<input type="checkbox"/> YES <input type="checkbox"/> NO
NEGLIGENT MANSLAUGHTER CIRCUMSTANCE			BUILDING INHABITED (ARSON)

OFFENSE #3 – 18035810

OFFENSE	OFFENSE COMPLETION
Poss Drug Paraphernalia W/i To Sell (48DC1103B-Z)	<input checked="" type="checkbox"/> COMPLETED <input type="checkbox"/> ATTEMPTED
OFFENSE CASE STATUS	
Cleared By Arrest (Mar 04, 2018)	
OFFENSE LOCATION	
1610 R STREET SE, WASHINGTON, DC 20020 Unit: 2 Type: Highway/ Road/ Alley/ Street/ Sidewalk Public/Private: Private PSA: 607 District: Sixth District	
LOCATION TYPE	POSITION (BEHIND, FRONT, INSIDE, SIDE)
Highway/ Road/ Alley/ Street/ Sidewalk	
LOCATION DESCRIPTION	
AGGRAVATED ASSAULT FACTORS/HOMICIDE FACTORS	OFFENSE PROPERTIES
HATE BIAS/MOTIVATION	
WEAPON/FORCE INVOLVED	

CRIMINAL ACTIVITIES		MODUS OPERANDI	
Possession/ Conceal			
FORCED ENTRY	# OF PREMISES	SECURITY SYSTEM	CARGO THEFT
<input type="checkbox"/> YES <input type="checkbox"/> NO			<input type="checkbox"/> YES <input type="checkbox"/> NO
NEGLIGENT MANSLAUGHTER CIRCUMSTANCE			BUILDING INHABITED (ARSON)

PROPERTY & ITEMS

STATUS / REASON FOR CUSTODY	DESCRIPTION	QTY.	DECLARED / FORFEITURE VALUE
Seized / Evidence	plastic containing loose rock like substance	1	
Seized / Evidence	\$568.00 US Currency	1	
Seized / Evidence	\$20.00 MPDC pre-recorded funds	1	
Seized / Evidence	Clear plastic containing rock like substance	1	
Seized / Evidence	Clear plastic containing rock like substance	1	
Seized / Evidence	Digital Scale	2	

CCN #18035810 – PUBLIC NARRATIVE

On the listed date, time and location Subjects 1-3 were involved and or engaged in an illegal drug transaction. Subjects 1-3 were in possession of the listed evidence and placed under arrest.

EXHIBIT 3

CCN #18039722 – PUBLIC INCIDENT REPORT

REPORT DATE / TIME Mar 11, 2018 12:00	DISTRICT / PSA Sixth District / 607	EVENT START DATE / TIME - EVENT END DATE / TIME Mar 11, 2018 10:22 - Mar 11, 2018 10:24	INCIDENT STATISTICS
RESPONDING OFFICER James Love (#7722) – MPD		WEATHER Clear	
ASSISTING OFFICER (ASSIST TYPE) Titus Peyton (#10042) (Undercover Officer), Travis Collins (#9686) (Assisting Officer), JOSEPH CHAPLIN JR (#6829) (Undercover Officer), WILLIAM TURNER (#6459) (Undercover Officer), DOMINIQUE TYSON (#7473) (Assisting Officer)			
TELETYPE DATE / TIME	TELETYPE #	WHO NOTIFIED TELETYPE	SHOTS FIRED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
			SHOTS EFFECT <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

OFFENSE #1 – 18039722

OFFENSE Distribution Of A Controlled Substance (48DC904.01(A)(1)-Z, 48DC904.01A1-Y)	OFFENSE COMPLETION <input checked="" type="checkbox"/> COMPLETED <input type="checkbox"/> ATTEMPTED
OFFENSE CASE STATUS Cleared By Arrest (Mar 11, 2018)	
OFFENSE LOCATION 1610 R STREET SE, WASHINGTON, DC 20020 Type: Residence/ Home Public/Private: Private PSA: 607 District: Sixth District	
LOCATION TYPE Residence/ Home	POSITION (BEHIND, FRONT, INSIDE, SIDE)
LOCATION DESCRIPTION	
AGGRAVATED ASSAULT FACTORS/HOMICIDE FACTORS	OFFENSE PROPERTIES
HATE BIAS/MOTIVATION	
WEAPON/FORCE INVOLVED	
CRIMINAL ACTIVITIES Distribute/ Selling	MODUS OPERANDI
FORCED ENTRY <input type="checkbox"/> YES <input type="checkbox"/> NO	# OF PREMISES
SECURITY SYSTEM	CARGO THEFT <input type="checkbox"/> YES <input type="checkbox"/> NO
NEGLIGENT MANSLAUGHTER CIRCUMSTANCE	BUILDING INHABITED (ARSON)

OFFENSE #2 – 18039722

OFFENSE Poss Of A Controlled Substance -misd (48DC904.01D)	OFFENSE COMPLETION <input checked="" type="checkbox"/> COMPLETED <input type="checkbox"/> ATTEMPTED
OFFENSE CASE STATUS Cleared By Arrest (Mar 11, 2018)	
OFFENSE LOCATION 1610 R STREET SE, WASHINGTON, DC 20020 Type: Residence/ Home Public/Private: Private PSA: 607 District: Sixth District	
LOCATION TYPE Residence/ Home	POSITION (BEHIND, FRONT, INSIDE, SIDE)
LOCATION DESCRIPTION	
AGGRAVATED ASSAULT FACTORS/HOMICIDE FACTORS	OFFENSE PROPERTIES
HATE BIAS/MOTIVATION	
WEAPON/FORCE INVOLVED	
CRIMINAL ACTIVITIES Possession/ Conceal	MODUS OPERANDI
FORCED ENTRY <input type="checkbox"/> YES <input type="checkbox"/> NO	# OF PREMISES
SECURITY SYSTEM	CARGO THEFT <input type="checkbox"/> YES <input type="checkbox"/> NO

NEGLIGENT MANSLAUGHTER CIRCUMSTANCE	BUILDING INHABITED (ARSON)
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OFFENSE #3 – 18039722

OFFENSE Probation Violation (Warrant) (99MPD008)	OFFENSE COMPLETION <input checked="" type="checkbox"/> COMPLETED <input type="checkbox"/> ATTEMPTED
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OFFENSE CASE STATUS Cleared By Arrest (Mar 11, 2018)
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OFFENSE LOCATION MPD HEADQUARTERS / POLICE HEADQUARTERS, 300 INDIANA AVENUE NW, WASHINGTON, DC 20001 Type: Government/ Public Building Public/ Private: Public PSA: 102 District: First District
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LOCATION TYPE Government/ Public Building	POSITION (BEHIND, FRONT, INSIDE, SIDE)
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LOCATION DESCRIPTION

AGGRAVATED ASSAULT FACTORS/HOMICIDE FACTORS	OFFENSE PROPERTIES
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HATE BIAS/MOTIVATION	
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WEAPON/FORCE INVOLVED	
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CRIMINAL ACTIVITIES	MODUS OPERANDI
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FORCED ENTRY <input type="checkbox"/> YES <input type="checkbox"/> NO	# OF PREMISES	SECURITY SYSTEM	CARGO THEFT <input type="checkbox"/> YES <input type="checkbox"/> NO
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NEGLIGENT MANSLAUGHTER CIRCUMSTANCE	BUILDING INHABITED (ARSON)
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PROPERTY & ITEMS

STATUS / REASON FOR CUSTODY	DESCRIPTION	QTY.	DECLARED / FORFEITURE VALUE
Recovered / Evidence	Loose white rock	2	50
Recovered / Evidence	\$100.00 dollars US currency	10	10
Recovered / Evidence	loose white rock	1	

CCN #18039722 – PUBLIC NARRATIVE

On 03/11/2018 S1 and S2 were involved in an illegal narcotic's transaction in the 1600 block of R St. SE. S1 and S2 were arrested and charged with Distribution of Crack Cocaine. S1 and S2 were transported to the Sixth District for processing without incident.

EXHIBIT 4

CCN #18055980 - PUBLIC INCIDENT REPORT

REPORT DATE / TIME Apr 08, 2018 19:39	DISTRICT / PSA Sixth District / 607	EVENT START DATE / TIME - EVENT END DATE / TIME Apr 08, 2018 18:06 - Apr 08, 2018 18:07	INCIDENT STATISTICS
RESPONDING OFFICER RICHARD GABSTER (#9434) - MPD		WEATHER Clear	
ASSISTING OFFICER (ASSIST TYPE) George Banks (#7050) (Assisting Officer), Justin Lyon (#8406) (Assisting Officer), RANDY HARRISON (#9693) (Undercover Officer), WILLIAM TURNER (#6459) (Undercover Officer)			
TELETYPE DATE / TIME	TELETYPE #	WHO NOTIFIED TELETYPE	SHOTS FIRED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
			SHOTS EFFECT <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

OFFENSE #1 - 18055980

OFFENSE Distribution Of A Controlled Substance (48DC904.01(A)(1)-Z, 48DC904.01A1-Y)	OFFENSE COMPLETION <input checked="" type="checkbox"/> COMPLETED <input type="checkbox"/> ATTEMPTED
OFFENSE CASE STATUS Cleared By Arrest (Apr 08, 2018)	
OFFENSE LOCATION 1610 R STREET SE, WASHINGTON, DC 20020 Type: Residence/ Home Public/Private: Private PSA: 607 District: Sixth District	
LOCATION TYPE Residence/ Home	POSITION (BEHIND, FRONT, INSIDE, SIDE) Side
LOCATION DESCRIPTION	
AGGRAVATED ASSAULT FACTORS/HOMICIDE FACTORS	OFFENSE PROPERTIES
HATE BIAS/MOTIVATION	
WEAPON/FORCE INVOLVED	
CRIMINAL ACTIVITIES Distribute/ Selling	MODUS OPERANDI
FORCED ENTRY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	# OF PREMISES
SECURITY SYSTEM	CARGO THEFT <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
NEGLIGENT MANSLAUGHTER CIRCUMSTANCE	BUILDING INHABITED (ARSON)

OFFENSE #2 - 18055980

OFFENSE Poss Of A Controlled Substance -misd (48DC904.01D)	OFFENSE COMPLETION <input checked="" type="checkbox"/> COMPLETED <input type="checkbox"/> ATTEMPTED
OFFENSE CASE STATUS Cleared By Arrest (Apr 08, 2018)	
OFFENSE LOCATION 1700 16TH STREET SE, WASHINGTON, DC 20020 Type: Highway/ Road/ Alley/ Street/ Sidewalk Public/Private: Public PSA: 607 District: Sixth District	
LOCATION TYPE Highway/ Road/ Alley/ Street/ Sidewalk	POSITION (BEHIND, FRONT, INSIDE, SIDE)
LOCATION DESCRIPTION	
AGGRAVATED ASSAULT FACTORS/HOMICIDE FACTORS	OFFENSE PROPERTIES
HATE BIAS/MOTIVATION	
WEAPON/FORCE INVOLVED	
CRIMINAL ACTIVITIES Possession/ Conceal	MODUS OPERANDI
FORCED ENTRY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	# OF PREMISES
SECURITY SYSTEM	CARGO THEFT <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

NEGLIGENT MANSLAUGHTER CIRCUMSTANCE	BUILDING INHABITED (ARSON)
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PROPERTY & ITEMS

STATUS / REASON FOR CUSTODY	DESCRIPTION	QTY.	DECLARED / FORFEITURE VALUE
Recovered / Evidence	loose white rock	1	
STATUS / REASON FOR CUSTODY	DESCRIPTION	QTY.	DECLARED / FORFEITURE VALUE
Recovered / Evidence	green zip of powder substance	3	

CCN #18055980 – PUBLIC NARRATIVE

At the listed time and location, S-1 was placed under arrest for distributing narcotics, and the listed property was recovered.

EXHIBIT 5

CCN #18060231 - PUBLIC INCIDENT REPORT

REPORT DATE / TIME Apr 15, 2018 18:12	DISTRICT / PSA Sixth District / 607	EVENT START DATE / TIME - EVENT END DATE / TIME Apr 15, 2018 15:51 - Apr 15, 2018 15:58	INCIDENT STATISTICS
RESPONDING OFFICER JENNIFER ELLIS (#9337) - MPD	WEATHER Rain		
ASSISTING OFFICER (ASSIST TYPE) RYAN TRAN (#9520) (Chain Of Custody), JOSEPH CHAPLIN JR (#6829) (Undercover Officer), James Love (#7722) (Body Worn Camera), Michael Nardi (#9323) (Body Worn Camera), Nikki Lavenhouse (#8639) (Chain Of Custody), George Banks (#7050) (Undercover Officer), Justin Lyon (#8406) (Body Worn Camera), Scott Brown (#9309) (Body Worn Camera)			
TELETYPE DATE / TIME	TELETYPE #	WHO NOTIFIED TELETYPE	SHOTS FIRED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
			SHOTS EFFECT <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

OFFENSE #1 - 18060231

OFFENSE Poss Of A Controlled Substance -misd (48DC904.01D)	OFFENSE COMPLETION <input checked="" type="checkbox"/> COMPLETED <input type="checkbox"/> ATTEMPTED
OFFENSE CASE STATUS Cleared By Arrest (Apr 15, 2018)	
OFFENSE LOCATION 1610 R STREET SE, WASHINGTON, DC 20020 Unit: 2 Type: Residence/ Home Public/Private: Private PSA: 607 District: Sixth District	
LOCATION TYPE Residence/ Home	POSITION (BEHIND, FRONT, INSIDE, SIDE) Inside
LOCATION DESCRIPTION	
AGGRAVATED ASSAULT FACTORS/HOMICIDE FACTORS	OFFENSE PROPERTIES
HATE BIAS/MOTIVATION	
WEAPON/FORCE INVOLVED	
CRIMINAL ACTIVITIES Possession/ Conceal	MODUS OPERANDI
FORCED ENTRY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	# OF PREMISES
	SECURITY SYSTEM
	CARGO THEFT <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
NEGLIGENT MANSLAUGHTER CIRCUMSTANCE	BUILDING INHABITED (ARSON)

PROPERTY & ITEMS

STATUS / REASON FOR CUSTODY	DESCRIPTION	QTY.	DECLARED / FORFEITURE VALUE
Recovered / Evidence	loose white rock substance	0.02	
Recovered / Evidence	loose white rock substance	0.02	
Seized / Evidence	Single \$5 dollar bill	1	

CCN #18060231 - PUBLIC NARRATIVE

The listed evidence was recovered from S-1 and S-2's person. S-1 and S-2 were placed under arrest for Possession of a Controlled Substance. S-1 and S-2 were transported to the Sixth District station without incident.

EXHIBIT 6

CCN #18060247 - PUBLIC INCIDENT REPORT

REPORT DATE / TIME Apr 15, 2018 18:09	DISTRICT / PSA Sixth District / 607	EVENT START DATE / TIME - EVENT END DATE / TIME Apr 15, 2018 16:20 - Apr 15, 2018 16:21	INCIDENT STATISTICS
RESPONDING OFFICER Michael Nardi (#9323) - MPD	WEATHER Cloudy		
ASSISTING OFFICER (ASSIST TYPE) RYAN TRAN (#9520) (Assisting Officer), Scott Brown (#9309) (Assisting Officer), JENNIFER ELLIS (#9337) (Assisting Officer), Nikki Lavenhouse (#8639) (Assisting Officer)			
TELETYPE DATE / TIME	TELETYPE #	WHO NOTIFIED TELETYPE	SHOTS FIRED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
			SHOTS EFFECT <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

REPORTING PERSON

NAME
R-1 Michael Nardi

OFFENSE #1 - 18060247

OFFENSE Distribution Of A Controlled Substance (48DC904.01(A)(1)-Z, 48DC904.01A1-Y)	OFFENSE COMPLETION <input checked="" type="checkbox"/> COMPLETED <input type="checkbox"/> ATTEMPTED
OFFENSE CASE STATUS Cleared By Arrest (Apr 15, 2018)	
OFFENSE LOCATION 1610 R STREET SE, WASHINGTON, DC 20020 Unit: 2 Type: Residence/ Home Public/Private: Private PSA: 607 District: Sixth District	
LOCATION TYPE Residence/ Home	POSITION (BEHIND, FRONT, INSIDE, SIDE)
LOCATION DESCRIPTION	
AGGRAVATED ASSAULT FACTORS/HOMICIDE FACTORS	OFFENSE PROPERTIES
HATE BIAS/MOTIVATION	
WEAPON/FORCE INVOLVED	
CRIMINAL ACTIVITIES Distribute/ Selling	MODUS OPERANDI
FORCED ENTRY <input type="checkbox"/> YES <input type="checkbox"/> NO	# OF PREMISES
SECURITY SYSTEM	CARGO THEFT <input type="checkbox"/> YES <input type="checkbox"/> NO
NEGLIGENT MANSLAUGHTER CIRCUMSTANCE	BUILDING INHABITED (ARSON)

OFFENSE #2 - 18060247

OFFENSE Poss Of A Controlled Substance -misd (48DC904.01D)	OFFENSE COMPLETION <input checked="" type="checkbox"/> COMPLETED <input type="checkbox"/> ATTEMPTED
OFFENSE CASE STATUS Cleared By Arrest (Apr 15, 2018)	
OFFENSE LOCATION KRAMER MIDDLE SCHOOL, 1700 Q STREET SE, WASHINGTON, DC 20020 Type: School/ College Public/Private: Public PSA: 607 District: Sixth District Stats: School Zone	
LOCATION TYPE School/ College	POSITION (BEHIND, FRONT, INSIDE, SIDE) Behind
LOCATION DESCRIPTION 1700 Fairlawn Ave SE	
AGGRAVATED ASSAULT FACTORS/HOMICIDE FACTORS	OFFENSE PROPERTIES
HATE BIAS/MOTIVATION	
WEAPON/FORCE INVOLVED	

CRIMINAL ACTIVITIES		MODUS OPERANDI	
Possession/ Conceal			
FORCED ENTRY	# OF PREMISES	SECURITY SYSTEM	CARGO THEFT
<input type="checkbox"/> YES <input type="checkbox"/> NO			<input type="checkbox"/> YES <input type="checkbox"/> NO
NEGLIGENT MANSLAUGHTER CIRCUMSTANCE			BUILDING INHABITED (ARSON)

PROPERTY & ITEMS

STATUS / REASON FOR CUSTODY	DESCRIPTION	QTY.	DECLARED / FORFEITURE VALUE
Seized / Evidence	White rock-like substance	1	
STATUS / REASON FOR CUSTODY	DESCRIPTION	QTY.	DECLARED / FORFEITURE VALUE
Seized / Evidence	Loose white rock-like substance	1	

CCN #18060247 - PUBLIC NARRATIVE

On the listed date and time D-1 was arrested for UCSA Distribution of Crack Cocaine and UCSA Possession of Crack Cocaine in reference to an undercover NSID drug enforcement operation.

EXHIBIT 7

CCN #18062001 - PUBLIC INCIDENT REPORT

REPORT DATE / TIME Apr 18, 2018 19:41	DISTRICT / PSA Sixth District / 607	EVENT START DATE / TIME - EVENT END DATE / TIME Apr 18, 2018 16:52 - Apr 18, 2018 18:22	INCIDENT STATISTICS
RESPONDING OFFICER Michael Nardi (#9323) - MPD	WEATHER Clear		
ASSISTING OFFICER (ASSIST TYPE) RICHARD GABSTER (#9434) (Assisting Officer), Jake Goss (#11036) (Assisting Officer), Robert Watlington (#9766) (Assisting Officer), Scott Brown (#9309) (Assisting Officer), Justin Lyon (#8406) (Assisting Officer), Brock Vigil (#6557) (Assisting Officer), Nikki Lavenhouse (#8639) (Assisting Officer)			
TELETYPE DATE / TIME	TELETYPE #	WHO NOTIFIED TELETYPE	SHOTS FIRED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
			SHOTS EFFECT <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

REPORTING PERSON

NAME
R-1 Michael Nardi

OFFENSE #1 - 18062001

OFFENSE Poss W/i To Dist A Controlled Substance (48DC904.01A1-X)	OFFENSE COMPLETION <input checked="" type="checkbox"/> COMPLETED <input type="checkbox"/> ATTEMPTED
OFFENSE CASE STATUS Cleared By Arrest (Apr 18, 2018)	
OFFENSE LOCATION 1610 R STREET SE, WASHINGTON, DC 20020 Unit: 2 Type: Residence/ Home Public/Private: Private PSA: 607 District: Sixth District	
LOCATION TYPE Residence/ Home	POSITION (BEHIND, FRONT, INSIDE, SIDE) Inside
LOCATION DESCRIPTION	
AGGRAVATED ASSAULT FACTORS/HOMICIDE FACTORS	OFFENSE PROPERTIES
HATE BIAS/MOTIVATION	
WEAPON/FORCE INVOLVED	
CRIMINAL ACTIVITIES Possession/ Conceal	MODUS OPERANDI
FORCED ENTRY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	# OF PREMISES
SECURITY SYSTEM	CARGO THEFT <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
NEGLIGENT MANSLAUGHTER CIRCUMSTANCE	BUILDING INHABITED (ARSON)

OFFENSE #2 - 18062001

OFFENSE Possession Of Drug Paraphernalia (48DC1103A-X, 48DUSC00904.10)	OFFENSE COMPLETION <input checked="" type="checkbox"/> COMPLETED <input type="checkbox"/> ATTEMPTED
OFFENSE CASE STATUS Cleared By Arrest (Apr 18, 2018)	
OFFENSE LOCATION 1610 R STREET SE, WASHINGTON, DC 20020 Unit: 2 Type: Residence/ Home Public/Private: Private PSA: 607 District: Sixth District	
LOCATION TYPE Residence/ Home	POSITION (BEHIND, FRONT, INSIDE, SIDE) Inside
LOCATION DESCRIPTION	
AGGRAVATED ASSAULT FACTORS/HOMICIDE FACTORS	OFFENSE PROPERTIES
HATE BIAS/MOTIVATION	
WEAPON/FORCE INVOLVED	

CRIMINAL ACTIVITIES		MODUS OPERANDI	
Possession/ Conceal			
FORCED ENTRY <input type="checkbox"/> YES <input type="checkbox"/> NO	# OF PREMISES	SECURITY SYSTEM	CARGO THEFT <input type="checkbox"/> YES <input type="checkbox"/> NO
NEGLIGENT MANSLAUGHTER CIRCUMSTANCE			BUILDING INHABITED (ARSON)

PROPERTY & ITEMS

STATUS / REASON FOR CUSTODY	DESCRIPTION	QTY.	DECLARED / FORFEITURE VALUE
Seized / Evidence	Samsung Galaxy Note 8	1	
Seized / Evidence	U.S. Currency	924	
Seized / Evidence	U.S. Currency	416	
Seized / Held For Civil Forfeiture	U.S. Currency	4214	
Seized / Evidence	Loose white rock-like substance	3.5	
Seized / Evidence	Clear plastic containing white rock-like substance	41	
Seized / Evidence	Digital Scale	1	
Seized / Evidence	Chorboy, glass pipe, and pusher	3	

CCN #18062001 – PUBLIC NARRATIVE

On the listed date and time NEU officers executed D.C. Superior Court search warrant 2018CSW2079, seized the listed evidence and arrested the listed defendants for the corresponding listed charges.

EXHIBIT 8

CCN #18109083 – PUBLIC INCIDENT REPORT

REPORT DATE / TIME Jul 04, 2018 04:36	DISTRICT / PSA Sixth District / 607	EVENT START DATE / TIME - EVENT END DATE / TIME Jul 04, 2018 03:46 -	INCIDENT STATISTICS
RESPONDING OFFICER Maria Leon – MPD	WEATHER		
ASSISTING OFFICER (ASSIST TYPE) ANTHONY GATON (#11123) (Assisting Officer), JACOB KRYCIA (#10612) (Transporting Officer), Raymond Belden (#7868) (Assisting Officer), Anthony Willis (Transporting Officer)			
TELETYPE DATE / TIME	TELETYPE #	WHO NOTIFIED TELETYPE	SHOTS FIRED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
			SHOTS EFFECT <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

REPORTING PERSON

NAME
R-1 R BELDEN

HOME ADDRESS
SIXTH DISTRICT POLICE STATION, 5002 HAYES STREET NE, WASHINGTON, DC 20019, UNITED STATES

OFFENSE #1 – 18109083

OFFENSE Possession Of Drug Paraphernalia (48DC1103A-X, 48DUSC00904.10)	OFFENSE COMPLETION <input checked="" type="checkbox"/> COMPLETED <input type="checkbox"/> ATTEMPTED
OFFENSE CASE STATUS Cleared By Arrest (Jul 04, 2018)	
OFFENSE LOCATION 1610 R STREET SE, WASHINGTON, DC 20020 Type: Residence/ Home Public/Private: Private PSA: 607 District: Sixth District	
LOCATION TYPE Residence/ Home	POSITION (BEHIND, FRONT, INSIDE, SIDE) Side
LOCATION DESCRIPTION In the ally along side 1610 R ST SE	
AGGRAVATED ASSAULT FACTORS/HOMICIDE FACTORS	OFFENSE PROPERTIES
HATE BIAS/MOTIVATION	
WEAPON/FORCE INVOLVED	
CRIMINAL ACTIVITIES Possession/ Conceal	MODUS OPERANDI
FORCED ENTRY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	# OF PREMISES
SECURITY SYSTEM	CARGO THEFT <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
NEGLIGENT MANSLAUGHTER CIRCUMSTANCE	BUILDING INHABITED (ARSON)

PROPERTY & ITEMS

STATUS / REASON FOR CUSTODY	DESCRIPTION	QTY.	DECLARED / FORFEITURE VALUE
Seized / Evidence	Glass Crack Pipe	1	
Seized / Evidence	One small vial containing tobacco flakes emitting a strong chemical odor consistant with PCP	1	

CCN #18109083 – PUBLIC NARRATIVE

BWC Activated

At the listed date, location, and time, S-1 was found with the listed items: 3 crack pipes and a small vial dark in color with tobacco flakes indicating that cigarettes have been dipped inside.

EXHIBIT 9

CCN #18113669 – PUBLIC INCIDENT REPORT

REPORT DATE / TIME Jul 11, 2018 17:11	DISTRICT / PSA Sixth District / 607	EVENT START DATE / TIME - EVENT END DATE / TIME Jul 11, 2018 16:02 - Jul 11, 2018 16:10	INCIDENT STATISTICS
RESPONDING OFFICER Justin Lyon (#8406) – MPD	WEATHER Clear		
ASSISTING OFFICER (ASSIST TYPE) Michael Nardi (#9323) (Body Worn Camera), RYAN TRAN (#9520) (Body Worn Camera), James Love (#7722) (Body Worn Camera)			
TELETYPE DATE / TIME	TELETYPE #	WHO NOTIFIED TELETYPE	SHOTS FIRED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
			SHOTS EFFECT <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

OFFENSE #1 – 18113669

OFFENSE Possession Of Unregistered Ammunition (07DUSC02506.01, 7DC2506.01)	OFFENSE COMPLETION <input checked="" type="checkbox"/> COMPLETED <input type="checkbox"/> ATTEMPTED
OFFENSE CASE STATUS Cleared By Arrest (Jul 11, 2018)	
OFFENSE LOCATION 1610 R STREET SE, WASHINGTON, DC 20020 Unit: 2 Type: Residence/ Home Public/Private: Private PSA: 607 District: Sixth District	
LOCATION TYPE Residence/ Home	POSITION (BEHIND, FRONT, INSIDE, SIDE) Inside
LOCATION DESCRIPTION	
AGGRAVATED ASSAULT FACTORS/HOMICIDE FACTORS	OFFENSE PROPERTIES Gun Involved,
HATE BIAS/MOTIVATION	
WEAPON/FORCE INVOLVED Other: magazine containing .40 cal ammo	
CRIMINAL ACTIVITIES Possession/ Conceal,	MODUS OPERANDI
FORCED ENTRY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	# OF PREMISES
SECURITY SYSTEM	CARGO THEFT <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
NEGLIGENT MANSLAUGHTER CIRCUMSTANCE	BUILDING INHABITED (ARSON)

OFFENSE #2 – 18113669

OFFENSE Possession Of Unregistered Firearm/unlawful Possession Of A Firearm Or Destructive Device (7DC2502.01)	OFFENSE COMPLETION <input checked="" type="checkbox"/> COMPLETED <input type="checkbox"/> ATTEMPTED
OFFENSE CASE STATUS Cleared By Arrest (Jul 11, 2018)	
OFFENSE LOCATION 1610 R STREET SE, WASHINGTON, DC 20020 Unit: 2 Type: Residence/ Home Public/Private: Private PSA: 607 District: Sixth District	
LOCATION TYPE Residence/ Home	POSITION (BEHIND, FRONT, INSIDE, SIDE) Inside
LOCATION DESCRIPTION	
AGGRAVATED ASSAULT FACTORS/HOMICIDE FACTORS	OFFENSE PROPERTIES
HATE BIAS/MOTIVATION	
WEAPON/FORCE INVOLVED Handgun,	
CRIMINAL ACTIVITIES Possession/ Conceal	MODUS OPERANDI
FORCED ENTRY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	# OF PREMISES
SECURITY SYSTEM	CARGO THEFT <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
NEGLIGENT MANSLAUGHTER CIRCUMSTANCE	BUILDING INHABITED (ARSON)

OFFENSE #3 – 18113669

OFFENSE Poss W/i To Dist A Controlled Substance (48DC904.01A1-X)			OFFENSE COMPLETION <input checked="" type="checkbox"/> COMPLETED <input type="checkbox"/> ATTEMPTED
OFFENSE CASE STATUS Cleared By Arrest (Jul 11, 2018)			
OFFENSE LOCATION 1610 R STREET SE, WASHINGTON, DC 20020 Unit: 2 Type: Residence/ Home Public/Private: Private PSA: 607 District: Sixth District			
LOCATION TYPE Residence/ Home	POSITION {BEHIND, FRONT, INSIDE, SIDE} Inside		
LOCATION DESCRIPTION			
AGGRAVATED ASSAULT FACTORS/HOMICIDE FACTORS		OFFENSE PROPERTIES	
HATE BIAS/MOTIVATION			
WEAPON/FORCE INVOLVED			
CRIMINAL ACTIVITIES Possession/ Conceal		MODUS OPERANDI	
FORCED ENTRY <input type="checkbox"/> YES <input type="checkbox"/> NO	# OF PREMISES	SECURITY SYSTEM	CARGO THEFT <input type="checkbox"/> YES <input type="checkbox"/> NO
NEGLIGENT MANSLAUGHTER CIRCUMSTANCE			BUILDING INHABITED (ARSON)

OFFENSE #4 – 18113669

OFFENSE Poss W/i To Dist A Controlled Substance (48DC904.01A1-X)			OFFENSE COMPLETION <input checked="" type="checkbox"/> COMPLETED <input type="checkbox"/> ATTEMPTED
OFFENSE CASE STATUS Cleared By Arrest (Jul 11, 2018)			
OFFENSE LOCATION 1610 R STREET SE, WASHINGTON, DC 20020 Unit: 2 Type: Residence/ Home Public/Private: Private PSA: 607 District: Sixth District			
LOCATION TYPE Residence/ Home	POSITION {BEHIND, FRONT, INSIDE, SIDE} Inside		
LOCATION DESCRIPTION			
AGGRAVATED ASSAULT FACTORS/HOMICIDE FACTORS		OFFENSE PROPERTIES	
HATE BIAS/MOTIVATION			
WEAPON/FORCE INVOLVED			
CRIMINAL ACTIVITIES Possession/ Conceal		MODUS OPERANDI	
FORCED ENTRY <input type="checkbox"/> YES <input type="checkbox"/> NO	# OF PREMISES	SECURITY SYSTEM	CARGO THEFT <input type="checkbox"/> YES <input type="checkbox"/> NO
NEGLIGENT MANSLAUGHTER CIRCUMSTANCE			BUILDING INHABITED (ARSON)

OFFENSE #5 – 18113669

OFFENSE Poss Of A Controlled Substance -misd (48DC904.01D)			OFFENSE COMPLETION <input checked="" type="checkbox"/> COMPLETED <input type="checkbox"/> ATTEMPTED
OFFENSE CASE STATUS Cleared By Arrest (Jul 11, 2018)			
OFFENSE LOCATION SIXTH DISTRICT POLICE STATION, 5002 HAYES STREET NE, WASHINGTON, DC 20019 Type: Government/ Public Building Public/Private: Public PSA: 608 District: Sixth District			

LOCATION TYPE Government/ Public Building		POSITION (BEHIND, FRONT, INSIDE, SIDE) Front	
LOCATION DESCRIPTION recovered from inside Wagon 61			
AGGRAVATED ASSAULT FACTORS/HOMICIDE FACTORS		OFFENSE PROPERTIES	
HATE BIAS/MOTIVIATION			
WEAPON/FORCE INVOLVED			
CRIMINAL ACTIVITIES Possession/ Conceal		MODUS OPERANDI	
FORCED ENTRY <input type="checkbox"/> YES <input type="checkbox"/> NO	# OF PREMISES	SECURITY SYSTEM	CARGO THEFT <input type="checkbox"/> YES <input type="checkbox"/> NO
NEGLIGENT MANSLAUGHTER CIRCUMSTANCE			BUILDING INHABITED (ARSON)

PROPERTY & ITEMS

STATUS / REASON FOR CUSTODY	DESCRIPTION	QTY.	DECLARED / FORFEITURE VALUE
Seized / Evidence	Smith and Wesson magazine containing 3 live .40 ammo	1	
Recovered / Evidence	Jennings Firearm Bryco .38 Jennings Firearms Co.	1	
Recovered / Evidence	clear plastic containing white rock like substance	1	
Recovered / Evidence	clear capsules containing tan powder substance	16	
Recovered / Evidence	Digital scales	2	
Recovered / Evidence	clear plastic containing tan powder substance	1	

CCN #18113669 – PUBLIC NARRATIVE

During the listed date, time, and location MPD executed a search warrant on the above listed residence. The listed evidence was recovered during the search and S-1 was placed under arrest for Unregistered firearm, Unregistered Ammunition, PWID Crack, and PWID Methamphetamines. S-1 was additionally charged with Poss of Crack Cocaine. Evidence was recovered from inside the transport vehicle enroute to the Sixth District.

S-2 was placed under arrest for Unregistered Firearm.

EXHIBIT 10

CCN #18122614 - PUBLIC INCIDENT REPORT

REPORT DATE / TIME Jul 25, 2018 15:46	DISTRICT / PSA Sixth District / 607	EVENT START DATE / TIME - EVENT END DATE / TIME Jul 25, 2018 15:33 - Jul 25, 2018 15:35	INCIDENT STATISTICS
RESPONDING OFFICER Brittany Cole (#9819) - MPD	WEATHER Clear		
ASSISTING OFFICER (ASSIST TYPE) RANDY HARRISON (#9693) (Undercover Officer), Reginald Hildebrandt (#10218) (Body Worn Camera), WILLIAM TURNER (#6459) (Undercover Officer), JOCAT YANEZ (#9952) (Body Worn Camera), HERBERT NICHOLLS III (#9093) (Undercover Officer)			
TELETYPE DATE / TIME	TELETYPE #	WHO NOTIFIED TELETYPE	SHOTS FIRED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
			SHOTS EFFECT <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

OFFENSE #1 - 18122614

OFFENSE Distribution Of A Controlled Substance (48DC904.01(A)(1)-Z, 48DC904.01A1-Y)	OFFENSE COMPLETION <input checked="" type="checkbox"/> COMPLETED <input type="checkbox"/> ATTEMPTED
OFFENSE CASE STATUS Cleared By Arrest (Jul 25, 2018)	
OFFENSE LOCATION 1610 R STREET SE, WASHINGTON, DC 20020 Type: Residence/ Home Public/Private: Private PSA: 607 District: Sixth District	
LOCATION TYPE Residence/ Home	POSITION (BEHIND, FRONT, INSIDE, SIDE) Behind
LOCATION DESCRIPTION rear alley	
AGGRAVATED ASSAULT FACTORS/HOMICIDE FACTORS	OFFENSE PROPERTIES
HATE BIAS/MOTIVATION	
WEAPON/FORCE INVOLVED	
CRIMINAL ACTIVITIES Distribute/ Selling	MODUS OPERANDI
FORCED ENTRY <input type="checkbox"/> YES <input type="checkbox"/> NO	# OF PREMISES
SECURITY SYSTEM	CARGO THEFT <input type="checkbox"/> YES <input type="checkbox"/> NO
NEGLIGENT MANSLAUGHTER CIRCUMSTANCE	BUILDING INHABITED (ARSON)

PROPERTY & ITEMS

STATUS / REASON FOR CUSTODY Recovered / Evidence	DESCRIPTION loose white rock like substance	QTY. 1	DECLARED / FORFEITURE VALUE
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CCN #18122614 - PUBLIC NARRATIVE

During the listed date, time, and location, S-1 completed a narcotics transaction during a buy bust operation. S-1 was placed under arrest for Distribution of Crack Cocaine.

EXHIBIT 11

Event Search Summary

Agency	Group	S	P	Date	Time	Event Num	Type	Subtype	Location	AL
MPD	6D	A	2	07/26/17	18:47:38	I20170443516	MADO	default	1610 R ST SE DC	0
MPD	6D	A	2	08/19/17	14:45:11	I20170495069	DISO	IP	1610 R ST SE DC	0
MPD	6D	A	2	08/24/17	09:56:52	I20170505390	ASSS	default	1610 R ST SE DC,2	0
MPD	6D	A	2	08/28/17	12:10:21	I20170514414	DISO	IP	1610 R ST SE DC	0
MPD	6D	A	2	08/31/17	18:26:59	I20170521421	DISO	IP	1610 R ST SE DC	0
MPD	6D	A	2	09/04/17	13:05:40	I20170529753	DISO	IP	1610 R ST SE DC	0
MPD	6D	A	2	09/08/17	20:24:48	I20170539074	FADI	-	1610 R ST SE DC,2	0
MPD	6D	A	1	09/13/17	03:27:01	I20170548280	ASSP	IP	1610 R ST SE DC	0
MPD	6D	C	1	09/13/17	03:40:24	I20170548283	AGAS	IP	1610 R ST SE DC	0
MPD	6D	A	3	09/13/17	14:50:47	I20170549104	SEEC	RPT	1610 R ST SE DC	0
MPD	6D	A	1	09/17/17	02:26:20	I20170557431	CJUA	JO	1610 R ST SE DC	0
MPD	6D	A	2	11/03/17	12:07:41	I20170664175	DISO	IP	1610 R ST SE DC	0
MPD	6D	A	2	11/15/17	13:59:11	I20170688408	DISO	IP	1610 R ST SE DC	0
MPD	6D	A	2	12/30/17	12:59:02	I20170777229	DISO	IP	1610 R ST SE DC:HALLWAY	0
MPD	6D	A	2	02/19/18	09:49:33	I20180095522	ANBT	JO	1610 R ST SE DC	0
MPD	6D	A	2	02/27/18	15:40:36	I20180112330	ANBT	JO	1610 R ST SE DC:IN THE REAR	0
MPD	6D	A	3	03/06/18	15:19:14	I20180126953	STOP	NOS3	1610 R ST SE DC	0
MPD	6D	A	1	03/09/18	01:36:49	I20180132165	DVAS	IP	1610 R ST SE DC	0
MPD	6D	A	3	03/11/18	10:29:50	I20180137115	DRGL	IP	1610 R ST SE DC	0
MPD	6D	A	3	03/21/18	17:10:38	I20180157925	STOP	NOS3	1610 R ST SE DC	0
MPD	6D	A	3	03/30/18	19:02:45	I20180176181	ASSS	default	1610 R ST SE DC	0
MPD	6D	A	3	04/09/18	15:39:47	I20180195974	UCSA	NOS3	1610 R ST SE DC	0
MPD	6D	A	3	04/15/18	16:25:49	I20180209179	UCSA	NOS3	1610 R ST SE DC	0
MPD	6D	A	2	04/18/18	17:39:41	I20180215039	BWRT	-	1610 R ST SE DC	0
MPD	6D	A	1	05/19/18	10:49:11	I20180280499	PD	default	1610 R ST SE DC	0
MPD	6D	A	3	07/01/18	11:53:14	I20180373555	UCSA	NOS3	1610 R ST SE DC	0
MPD	6D	A	3	07/11/18	16:41:33	I20180396225	WEAP	default	1610 R ST SE DC: APT 2	0
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EXHIBIT 12

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Attorney General



ATTORNEY GENERAL
Karl A. Racine

Public Advocacy Division

March 22, 2018,

Everett Murtagh & Oxana Jourkiv
1124 G Street NE
Washington, D.C. 20002

Re: Notice of Unlawful Activity at 1610 R Street, SE Apartment 2

Dear Mr. Murtagh and Mrs. Jourkiv:

The Office of the Attorney General for the District of Columbia has received information that you are the owner of a four-unit brick building located at 1610 R Street, SE, Washington, DC 20020 (“the property”). I am contacting you at this time to seek an immediate meeting with you regarding illegal activity that has been occurring at your property, specifically in Apartment 2.

There have been multiple reports or complaints of illegal activity occurring at the property that include, but are not limited to, the sale of drugs, a buy/bust operation conducted at the property, and the seizure of drugs and drug paraphernalia. On March 4, 2018, while in the area of the 1600 Block of R Street, SE, undercover officers provided Latonya Stuckey with a \$20 to purchase Crack Cocaine. Police observed her walking to the right window of 1610 R Street, SE, where she then knocked on the window. Jamal Borum answered and opened the front apartment door for Stuckey. Borum accepted the money from Stuckey and Stuckey returned to the undercover officers to give them a small bag of Crack cocaine. Stuckey was arrested for possession and distribution of a controlled substance.

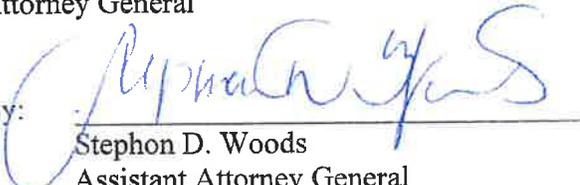
Later, officers approached the same window and asked Borum to provide access to the apartment building. Phillip Mayrant opened the front door for the officers. Officers entered the front lobby area and observed Apartment 2, specifically seeing in plain view two digital scales both containing a measurable amount of white rock substance, which tested positive for Cocaine base. Officers stepped Borum and Mayrant outside for identification procedure. Borum was identified by officers as the seller from the transaction with Stuckey. Officers recovered money from Borum. Officers also recovered from the top of the TV in plain view clear plastic bags with loose white rock substance, which tested positive for Cocaine Base. Borum and Mayrant were also placed under arrest for a combination of distribution of a controlled substance, possession of a controlled substance, and possession of drug paraphernalia with intent to sell.

Because of the seriousness of the complaints that MPD and the Office of the Attorney General has received about your property, we are investigating it as a drug and firearm nuisance pursuant to D.C. Code §§ 42-3101 to -3114 (2016). Under this D.C. law, my office may take action against a property owner who does not maintain their property in accordance with District of Columbia law and in a manner that does not cause, create, or maintain a nuisance. The law places the responsibility on you to ensure that your property is not used in a manner that is detrimental to the welfare of the surrounding area.

Please note that this letter is notice to you that your property may constitute such nuisance, and therefore we would like to invite you to meet with members of the Office of Attorney General regarding the activity at your property and what steps you will take to correct it. Please contact me within fourteen days of receipt of this letter. I can be reached at (202) 724-5319 or at the email address listed below. I thank you in advance for your prompt attention and response to this request.

Sincerely,

KARL A. RACINE
Attorney General

By: 
Stephon D. Woods
Assistant Attorney General
Housing and Community Justice
Office of the Attorney General for the District of Columbia
Phone: (202) 724-5319
Email: Stephon.Woods@dc.gov

GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF THE ATTORNEY GENERAL
FOR THE DISTRICT OF COLUMBIA

OFFICIAL BUSINESS
PENALTY FOR MISUSE

REPLY TO: Stephen Woods, AAG
441 4th Street NW, Suite 630south
Washington, DC 20001



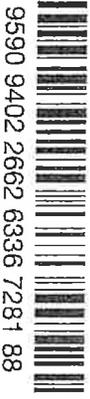
7012 1640 0001 8227 4537

Everett Murtagh & Oxana Jourkin
1124 G Street NE
Washington, D.C. 20002

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
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1. Article Addressed to:
Everett Murtagh & Oxana Jankiv
1124 G Street NE
Washington, DC 20002



9590 9402 2662 6336 7281 88

2. Article Number (Transfer from service label)
7012 1640 0001 8227 4537

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

- A. Signature
 Signature
 Agent
 Addressee
- B. Received by (Printed Name) _____ C. Date of Delivery _____
- D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type
- Adult Signature
 - Adult Signature Restricted Delivery
 - Certified Mail®
 - Certified Mail Restricted Delivery
 - Collect on Delivery
 - Collect on Delivery Restricted Delivery
 - Insured Mail
 - Insured Mail Restricted Delivery (over \$500)
 - Priority Mail Express®
 - Registered Mail™
 - Registered Mail Restricted Delivery
 - Return Receipt for Merchandise
 - Return Receipt for Signature Confirmation™
 - Signature Confirmation™
 - Signature Confirmation Restricted Delivery

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For delivery information, visit our website at www.usps.com®.

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Extra Services & Fees (check box, add fee as appropriate)

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Adult Signature Required \$ _____

Adult Signature Restricted Delivery \$ _____

Postage \$ _____

Total Postage and Fees \$ _____

Postmark Here 3/12/18

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Street and Apt. No., or PO Box No. 1124 G Street NE
City, State, ZIP+4 Washington DC 20002

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

7012 0190 0000 0000 4569 4966

EXHIBIT 13

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Attorney General



ATTORNEY GENERAL
Karl A. Racine

Public Advocacy Division

July 13, 2018

Everett Murtagh and Oxana Jourkiv
1124 G Street NE
Washington, D.C. 20002

Re: Notice of Unlawful Activity at 1610 R Street, SE Apartment 2

Dear Mr. Murtagh and Mrs. Jourkiv:

I am writing to follow up on our communications concerning the complaints of unlawful activity that OAG received about your property located at 1610 R Street SE, Washington, DC 20020. As you may remember, our office transmitted a formal notice letter to you in March of 2018 regarding several complaints and the recovery of drugs at your property. In response, you contacted our office to discuss measures that you would take to abate the apparent drug nuisance activity at your property. We discussed installation of security cameras at the property and registration of those cameras with the Metropolitan Police Department's (MPD) Private Security Camera System Incentive Program (Incentive Program). We also discussed the likely eviction of the occupants that are the cause of drug nuisance activities at the property, specifically Unit 2. I agreed to follow up with MPD to arrange a conversation about steps you could take towards the abatement of the nuisance activity beyond these two recommendations.

Since our last communication, I have spoken with MPD and officers have confirmed that eviction of the occupant(s) of Unit 2 at 1610 R Street SE would be an appropriate step towards abatement of the drug and firearm nuisance activity on and near the property. OAG also reiterates its recommendation that you install security cameras, maintain full functionality, register under the MPD Incentive Program and coordinate with MPD for access to these cameras to assist MPD with curbing drug and firearm nuisance activity. In the event you have begun to implement either of these suggestions, please inform our office as soon as possible.

I'm also writing to inform you that there was another search warrant that was executed on July 11, 2018 that resulted in the recovery of drugs, drug paraphernalia, firearms and ammunition. MPD arrested your tenant, Phillip Mayrant plus another individual for possession of unregistered ammunition, possession of unregistered firearm, possession of a controlled substance, and possession with intent to distribute a controlled substance. I've attached the public incident report for your reference and records. Based on this and other activity in and

around your property, it is clear that there remains an adverse impact on the surrounding community resulting from the drug and firearm nuisance activity stemming from your property.

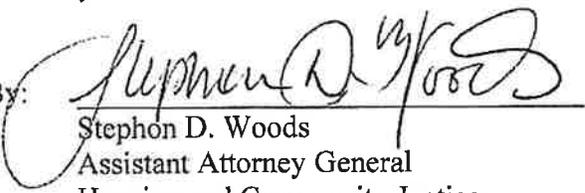
Also present during the search warrant was an individual by the name of Jamal Borum. As you may recall, Jamal Borum was mentioned in OAG's original March 2018 letter to you regarding drug nuisance activity at your property. Specifically, he was observed engaging in another individual for the purchase and sale of a controlled substance. In light of Jamal Borum's continued presence at the property and the persistent use of your property by Phillip Mayrant to engage in the sale of controlled substances and firearm possession, OAG recommends barring these two individuals from the property and strict enforcement of the barring notices, which would mean filing charges for trespass. Please note that you must comply with D.C. law to evict Phillip Mayrant to take possession of the property. A barring notice prior to an eviction will likely not suffice.

As explained previously, because of the number and seriousness of the complaints that MPD and the Office of the Attorney General has received about your property, we believe it may constitute a drug and firearm nuisance pursuant to D.C. Code §§ 42-3101 to -3114 (2016). OAG reiterates that this law places the responsibility on you to ensure that your property is not used in a manner that is detrimental to the welfare of the surrounding area.

I thank you in advance for your prompt attention to these requests.

Sincerely,

KARL A. RACINE
Attorney General

By: 
Stephon D. Woods
Assistant Attorney General
Housing and Community Justice
Office of the Attorney General for the District of Columbia
Phone: (202) 724-5319
Email: Stephon.Woods@dc.gov

GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF THE ATTORNEY GENERAL
FOR THE DISTRICT OF COLUMBIA

OFFICIAL BUSINESS
PENALTY FOR MISUSE

REPLY TO: Stephen Woods, AAG

CERTIFIED MAIL®



7018 0040 0001 1317 2010

Everett Murtagh & Oxana Tourkin
1124 G Street NE
Washington, D.C. 20002

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Everett Murtagh & Orana Tourkin
1124 G Street NE
Washington, D.C. 20002

9590 9402 3680 7335 1631 71



2. Article Number (Transfer from service label)

7018 0040 0001 1317 2010

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

Agent

B. Received by (Printed Name)

Addressee

C. Date of Delivery

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery
- Insured Mail
- Insured Mail Restricted Delivery (over \$500)
- Priority Mail Express®
- Registered Mail™
- Registered Mail Restricted Delivery
- Return Receipt for Merchandise
- Signature Confirmation™
- Signature Confirmation Restricted Delivery

Domestic Return Receipt

7018 0040 0001 1317 2010

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT <i>Domestic Mail Only</i>	
For delivery information, visit our website at www.usps.com ®	
OFFICIAL USE	
Certified Mail Fee \$ _____	Postmark Here 7/13/18
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy) \$ _____	
<input type="checkbox"/> Return Receipt (electronic) \$ _____	
<input type="checkbox"/> Certified Mail Restricted Delivery \$ _____	
<input type="checkbox"/> Adult Signature Required \$ _____	
<input type="checkbox"/> Adult Signature Restricted Delivery \$ _____	
Postage \$ _____	
Total Postage and Fees \$ _____	
Sent To <u>Everett Murtagh & Oxana Jourkin</u>	
Street and Apt. No., or PO Box No. <u>1124 G Street NE</u>	
City, State, ZIP+4® <u>Washington, DC 20007</u>	
PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions	

EXHIBIT 14

**IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

DISTRICT OF COLUMBIA
441 4th Street NW
Washington, D.C. 20001

Plaintiff

v.

EVERETT MURTAGH
1124 G Street NE
Washington, D.C. 20002;

and

OXANA JOURKIV
1124 G Street NE
Washington, D.C. 20002

Defendants.

Civ. No. 2018-CA-_____

AFFIDAVIT OF MICHAEL NARDI

I, Michael Nardi, having been put under oath, hereby state the following:

1. I am over the age of 18 and competent to give testimony under oath.
2. I have been employed with the Metropolitan Police Department (MPD) in Washington, D.C., for almost seven years. I am currently an officer with the Narcotics and Special Investigations Division (NSID).
3. My unit has conducted narcotics investigations and enforcement activities at 1610 R St. SE, Washington, D.C. 20020, and 1614 R St. SE, Washington, D.C. 20020 (collectively, "the Properties").
4. Based on numerous searches and arrests, I know the Properties to be high drug trafficking locations with an extensive and adverse impact on the surrounding area.

Visits to 1610 R St. SE

1. On April 15, 2018, my unit observed a drug transaction at 1610 R St. SE, Apartment 2. Officers on my unit watched two subjects knock on the window of Apartment 2, enter the building, and leave a short time later. I stopped one subject, found crack cocaine on her person, and made an arrest. Other officers arrested the second subject, also for possession of crack cocaine.
2. Having confirmed that the apartment was dealing that day, my unit executed a buy-bust operation with MPD prerecorded funds. Undercover officers observed an individual flagging down cars, which I know to be a common drug-seeking behavior, and engaged her in a brief conversation about the purchase of crack cocaine. Officers from my unit witnessed the subject knock on the window of Apartment 2 and enter the building. The subject returned with crack cocaine. Shortly thereafter, I located the undercover vehicle and arrested the subject for distribution and possession of crack cocaine.
3. The multiple arrests on April 15, 2018 provided probable cause for a search warrant, which my unit executed on April 18, 2018. I entered Apartment 2 and recovered 3.5 grams of unpackaged cocaine, a weight that is more consistent with intent to distribute than with personal consumption. I also recovered two pieces of clear plastic containing cocaine, which together weighed 41 grams, as well as drug paraphernalia and over \$5,500 in U.S. currency. I arrested five subjects inside the apartment, including the tenant, for possession of a controlled substance with intent to distribute.
4. On July 11, 2018, my unit executed another search warrant at 1610 R St. SE. I entered Apartment 2 and recovered cocaine, drug paraphernalia, an unregistered firearm, and

unregistered ammunition. I assisted in arresting the tenant and his girlfriend, who were both inside the apartment.

Visits to 1614 R St. SE

5. On February 6, 2018, my unit executed a search warrant at 1614 R St. SE, Apartment 2. Upon entering the apartment, I recovered one digital scale, one glass pipe, multiple empty zip bags, and crack cocaine. I arrested two subjects inside the apartment, including the tenant.
6. On March 6, 2018, my unit visited 1614 R St. SE in response to citizen drug complaints. My unit observed subjects knocking on the back door of the building, exchanging currency with a woman inside, and entering Apartment 2. Officers believed this to be a drug transaction. I stopped the subjects shortly thereafter and recovered narcotics. I arrested one subject and assisted with two other arrests, all for possession of crack cocaine.

Reputation and Community Impact

7. I know these Properties to be “crack houses,” where one can purchase and use drugs.
8. I have observed an overwhelming volume of vehicular and pedestrian traffic to the Properties that is related to drug purchases.
9. I believe that residents near the Properties are routinely subjected to unwanted solicitations to purchase drugs.
10. MPD frequently receives citizen complaints related to these Properties. They are chronically on the drug complaint list.

11. MPD conducts investigative operations at the Properties approximately every month.
That frequency has fallen because the Properties lie outside of MPD's summer crime initiative area. Previously, MPD visited the Properties at least once a week.
12. I know that the drug activity at these Properties has an adverse impact on the two nearby schools, Kramer Middle School and Anacostia High School. Officers on my unit have made arrests across the street from the schools, in plain view of the students.
13. It is my informed conclusion that the drug and firearm activity at the Properties is more pervasive than my unit has observed. My unit executed search warrants during the day. I believe that drug dealers also visit the Properties after dark, armed with weapons.
14. These Properties are the two locations in the neighborhood where most drug activity takes place. They have drawn the most attention by far from my unit.
15. The community impact is felt many blocks away. My unit has conducted buy-bust operations as far away as Minnesota Ave. SE and Good Hope Rd. SE. Inevitably, the subjects return to 1610 R St. SE or 1614 R St. SE to obtain drugs.

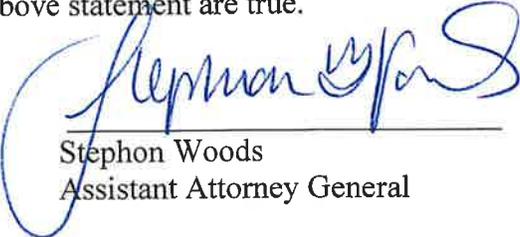
Remedies

16. In my judgment, the tenants in 1610 R St. SE, Apartment 2, and 1614 R St. SE, Apartment 2, must be evicted in order to abate the drug activity at the Properties. Having arrested both tenants, I believe that they are allowing drug dealers to operate out of their apartments in exchange for drugs.
17. I also believe that the landlords at the Properties need to install external and internal cameras and improve lighting, in consultation with MPD, in order to prevent recurring drug activity.



Michael Nardi

Michael Nardi personally appeared this 1st day of August, 2018, and made oath before me that the facts set forth in the above statement are true.



Stephon Woods
Assistant Attorney General